

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

MELISSA ARMSTRONG, ROLAND NADEAU, KARYN RAY, LINDA GORDAN, ERIK HEINRICH, SANDRA GREEN, and RUTH BOGUE, individually and on behalf of other similarly situated persons,

Plaintiffs,

v.

KIMBERLY-CLARK CORPORATION,

Defendant.

Civil Action No. 3:20-CV-3150-M  
LEAD CASE

(Consolidated With Civil Action No. 3:21-CV-01484-M)

**JOINT STATUS REPORT AND PROPOSED SCHEDULE**

1. On December 20, 2021, the parties filed a joint status report following their participation in a mediation, which advised the Court that they were unable to reach resolution at that session but were continuing to negotiate with the assistance of the Honorable Deborah Hankinson serving as mediator. (ECF No. 44). The parties requested that the Court hold current deadlines in abeyance pending the parties' submission of a joint status report on January 28, 2022 (*see id.*), which was ordered by the Court. (ECF No. 45).

2. The parties have continued to engage in settlement discussions and believe that entry of a scheduling order frontloading certain third-party discovery will be beneficial to the underlying litigation and help facilitate ongoing settlement discussions. Accordingly, subject to the Court's approval, the parties hereby propose the following schedule:

3. Plaintiffs may serve third-party discovery beginning on February 28, 2022.

4. The parties shall submit a proposed scheduling order on or before March 29, 2022 (*see ECF No. 17*).

5. Plaintiffs shall file a consolidated amended complaint on or before March 29, 2022.
6. Kimberly-Clark shall file a responsive pleading to the consolidated amended complaint on or before April 28, 2022.
7. Plaintiffs shall file an opposition brief on or before May 30, 2022.
8. Kimberly-Clark shall file a reply brief, if any, on or before June 13, 2022.
9. For the foregoing reasons, the parties respectfully request that the Court enter the deadlines proposed herein.

Respectfully submitted this 28th day of January, 2022.

/s/ Heather L. Richardson (with permission)

**Gibson, Dunn & Crutcher LLP**

Veronica S. Lewis

Texas Bar No. 24000092

Timothy W. Loose\*

Heather L. Richardson\*

Andrew LeGrand

Texas Bar No. 24070132

Katherine C. Yarger\*\*

2001 Ross Ave., Suite 2100

Dallas, TX 75201-2923

Tel: (214) 698-3100

Fax: (214) 571-2936

[vlewis@gibsondunn.com](mailto:vlewis@gibsondunn.com)

[tloose@gibsondunn.com](mailto:tloose@gibsondunn.com)

[hrichardson@gibsondunn.com](mailto:hrichardson@gibsondunn.com)

[alegrand@gibsondunn.com](mailto:alegrand@gibsondunn.com)

[kyarger@gibsondunn.com](mailto:kyarger@gibsondunn.com)

\**Pro Hac Vice*

\*\**Pro Hac Vice* Application Forthcoming

**ATTORNEYS FOR DEFENDANT  
KIMBERLY-CLARK CORPORATION**

/s/ Joshua L. Hedrick

**Hedrick Kring Bailey PLLC**

Joshua L. Hedrick

Texas Bar No. 24061123

Mark A. Fritsche

Texas Bar No. 24100095

1700 Pacific Ave., Suite 4650

Dallas, TX 75201

Tel: (214) 880-9600

Fax: (214) 481-1844

[Josh@HedrickKring.com](mailto:Josh@HedrickKring.com)

[Mark@Hedrickkring.com](mailto:Mark@Hedrickkring.com)

**Stueve Siegel Hanson LLP**

Patrick J. Stueve\*

J. Austin Moore\*

Abby McClellan\*

Crystal Cook Leftridge\*

460 Nichols Rd., Ste. 200

Kansas City, MO 64112

Tel: (816) 714-7100

[stueve@stuevesiegel.com](mailto:stueve@stuevesiegel.com)

[moore@stuevesiegel.com](mailto:moore@stuevesiegel.com)

[mcclellan@stuevesiegel.com](mailto:mcclellan@stuevesiegel.com)

[cook@stuevesiegel.com](mailto:cook@stuevesiegel.com)

\**Pro Hac Vice*

**ATTORNEYS FOR PLAINTIFFS  
MELISSA ARMSTRONG, ROLAND  
NADEAU, KARYN RAY, LINDA  
GORDAN, ERIK HEINRICH, SANDRA  
GREEN, and RUTH BOGUE**

**Lewis Johs Avallone Avilles, LLP**

James F. Murphy\*

Jordan S. Palatiello\*

One CA Plaza, Suite 225

Islandia, New York 11749

Tel: (631) 755-0101

[jfmurphy@lewisjohs.com](mailto:jfmurphy@lewisjohs.com)

[jspalatiello@lewisjohs.com](mailto:jspalatiello@lewisjohs.com)

\**Pro Hac Vice*

**Reese, LLP**  
Michael R. Reese\*\*  
100 West 93rd Street, 16th Floor  
New York, New York 10025  
[mreese@reesellp.com](mailto:mreese@reesellp.com)

\*\**Pro Hac Vice* Application Forthcoming

**ATTORNEYS FOR PLAINTIFF DAWN  
ROTHFELD**

**CERTIFICATE OF SERVICE**

On January 28, 2022, I caused to be electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel and/or pro se parties of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Joshua L. Hedrick  
Joshua L. Hedrick